

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

<i>Mambu Bayoh</i>	
Plaintiffs	Civil Action 2:18-cv-5820 DLC
v.	Judge: Denise L. Cote
AfroPunk, LLC, et al.	
Defendants.	

**EXPERT REPORT
OF MICHAEL A. EINHORN, Ph.D.,
ON BEHALF OF DEFENDANTS**

February 14, 2020

Section 3 amended October 9, 2020

1. INTRODUCTION

As permitted by Rule 26(a)(2)(E) as a supplementation, this Report includes a more detailed accuracy of the documents that I had reviewed leading up to the preparation of this report, dated initially February 14, 2020. Nothing in my report, in terms of substance or other provisions, is

being amended or supplemented at this time. Nothing as to this disclosure changes or alters my opinions reached from my report dated initially February 14, 2020.

3. DOCUMENTS REVIEWED

I reviewed the following documents in connection with my work as an expert witness here:

Plaintiff's Amended Complaint, including exhibits

Order & Opinion on Summary Judgment, Southern District of New York, January 15, 2020

Expert Report of Rob Wallace, including exhibits and appendixes

Defendants' interrogatories and request for production and Plaintiff's responses thereto

Plaintiff's interrogatories and request for production and responses thereto

Financial records of Afropunk, LLC

Standard photographers' releases used by Defendants

Defendants' Rule 56.1 statement in support summary judgment motion

Copyright, Causality, and the Courts, Author, Journal of the Copyright Society, Winter, 2015

<https://www.asmp.org/professional-development/licensing-guide/license-photography/>

<https://www.entrepreneur.com/article/302607>

/s/ Michael Einhorn
Michael A. Einhorn, Ph.D
October 9, 2020

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Mambu Bayoh

Plaintiffs

v.

Afropunk, LLC, et al.

Defendants.

Civil Action 2:18-cv-5820 DLC

Judge: Denise L. Cote

**EXPERT REPORT
OF MICHAEL A. EINHORN, Ph.D.,
ON BEHALF OF DEFENDANTS**

**March 20, 2020
amended**

Section 3 amended October 9, 2020

1. INTRODUCTION

As permitted by Rule 26(a)(2)(E) as a supplementation, this Report includes a more detailed accuracy of the documents that I had reviewed leading up to the preparation of this report, dated initially March 20, 2020. Nothing in my report, in terms of substance or other provisions, is being amended or supplemented at this time. Nothing as to this disclosure changes or alters my opinions reached from my report dated initially March 20, 2020.

3. DOCUMENTS REVIEWED

I reviewed the following documents in connection with my work as an expert witness here:

Plaintiff's Amended Complaint

Order & Opinion on Summary Judgment, Southern District of New York, January 15, 2020

Expert Report of Rob Wallace, including exhibits or appendixes

Expert Report of Weston Anson, including exhibits or appendixes

Defendants' interrogatories and request for production and Plaintiff's responses thereto

Plaintiff's interrogatories and request for production and responses thereto

Financial records of Afropunk, LLC

Standard photographers' releases used by Defendants

Defendants' Rule 56.1 statement in support summary judgment motion

Excerpts of Plaintiff's deposition transcript

Copyright, Causality, and the Courts, Author, Journal of the Copyright Society, Winter, 2015

<https://www.asmp.org/professional-development/licensing-guide/license-photography/>

<https://www.entrepreneur.com/article/302607>

/s/ Michael Einhorn
Michael A. Einhorn, Ph.D
October 9, 2020

Civil Action 2:18-cv-5820 DLC

Michael A. Einhorn, Ph.D.